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May 28, 2020

VIA CM/ECF & FEDEX

Honorable Colleen McMahon
 Chief United States District Judge
 Daniel Patrick Moynihan U.S. Courthouse
 U.S. District Court
 Southern District of New York
 500 Pearl Street, Courtroom 24A
 New York, NY 10007-1312

Re: *The RDI Corporation v. Charter Communications, Inc.*, Case No. 1:19-cv-10929
 (S.D.N.Y.)

Dear Judge McMahon:

MEMO ENDORSED

Pursuant to Local Rule 7.1(d) and your Honor's Individual Rule of Practice V.I., Plaintiff The RDI Corporation and Defendant Charter Communications, Inc. jointly move the Court by letter motion for entry of the enclosed stipulated protective order to govern the exchange and disclosure of confidential and sensitive information and documents during discovery in this matter. The proposed stipulated order includes the Addendum outlined in your Individual Rules of Practice.

Please let us know if you require any additional information. We appreciate the Court's consideration.

Respectfully submitted,

/s/ Chelsea Koff

Craig S. Barnett (*pro hac vice*)
 Chelsea E. Koff (*pro hac vice*)
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 SITTERSON, P.A.**

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/s/ Ryan D. Watstein

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KABAT CHAPMAN & OZMER

6/24/2020
 In view of recent Court Court rulings
 about sealed documents I am reworking
 my "addendum" to the confidential
 stipulation. See attached. I will allow
 you to file under seal documents
 No ~~seal~~ ~~for~~ ~~is~~ Unredacted version
 of documents containing

"Confidential"
 Information (not
 "Protective
 Material")

you
 must
 file

redacted versions
 of all sealed
 documents -
 redacting only
 the "confidential"
 information
 on the public
 record. I will
 not allow
 this case to be litigated
 under seal

Chloe M. Mc

Honorable Colleen McMahon
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*Counsel for Defendant Charter
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Counsel for Plaintiff The RDI Corporation

Dated: May 28, 2020

Enclosure

Cc (*via email*): All counsel of record